

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-20104-cr-MARTINEZ(s)(s)(s)(s)(s)**

**UNITED STATES OF AMERICA,**

**vs.**

**RODOLPHE JAAR,  
JOSEPH JOEL JOHN,  
JOSEPH VINCENT,  
GERMAN ALEJANDRO RIVERA GARCIA,  
MARIO ANTONIO PALACIOS PALACIOS, and  
FREDERICK JOSEPH BERGMANN, Jr.**

**Defendants.**

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**JOINT MOTION FOR COURT ORDER APPROVING  
AGREED-UPON RESTITUTION AND FOR THE ENTRY  
OF AMENDED JUDGMENTS**

The United States of America and the above captioned defendants, through their attorneys, file this motion jointly recommending that this Court set restitution to be paid by the Defendants, jointly and severally, in the amount of \$5,305,387.50 for VICTIM 1 and \$865,396.84 for VICTIM 2.

The United States will provide the Probation Office with a victim list, the victims' attorneys' contact information, and the amount of restitution that the victim is owed (the "Victim List"). The Probation Office will provide the Victim List to the Court by separate memorandum in order to preserve the confidentiality of the victims' identity and personal information.

**WHEREFORE**, the parties respectfully request that the Court set restitution in the amount of \$5,305,387.50 for VICTIM 1 and \$865,396.84 for VICTIM 2, order payment to be made to the victims set forth in the Victim List being provided to the Court by the Probation Office, and that

the Court enter amended judgments reflecting these restitution amounts, to be paid jointly and severally by the defendants.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

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I HEREBY CERTIFY that on May 21, 2024,  
I filed the foregoing pleading electronically  
through the CM/ECF system, which caused counsel  
of record to be served by electronic means.

Frank Russo  
Trial Attorney